ORIGINAL

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

ROBIN ASHLEY MEADOR (02)

No. 4:16-MJ-246

JOINT MOTION TO EXTEND TIME TO INDICT

The government, joined by above-named defendant, files this Joint Motion to Extend Time to Indict:

1. On April 19, 2016, a criminal complaint was filed against the defendant for possession with intent to distribute a controlled substance with intent to distribute, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C). She was taken into federal custody on April 22, 2016. That same day, she waived her preliminary hearing, and was released with conditions pending further proceedings.

2. Under the Speedy Trial Act, an indictment must be returned on the instant charge within thirty days from the date on which such [defendant] was arrested . . . in connection with such charges. 18 U.S.C. § 3161(b).

3. The parties request the Court to extend the time in which an indictment must be returned until June 16, 2016. This would be an extension of approximately 25 days. The 30th day would fall on or about May 22, 2016, not counting excludable time under 18 U.S.C. § 3161(h).

4. The reasons for the request are set forth below:

   a. The parties are in the process of discovery and plea negotiations. This process will likely impact the charges presented to the grand jury.

   b. Granting an extension of time to indict would be in the interest of judicial economy. If the thirty-day time period is extended, it is possible that a plea agreement can be reached, thus negating the need to indict.

5. The parties believe that such an extension would serve the ends of justice and outweigh the best interest of the public in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A). The parties submit that the request is not made in an effort to unduly delay the proceedings; but rather to insure that justice is achieved.

6. Both the government and the defendant join in this request.

Respectfully submitted,

JOHN PARKER
UNITED STATES ATTORNEY

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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Mark Danielson, counsel for defendant, and he communicated on behalf of his client that this motion is unopposed.

CHRISTOPHER R. WOLFE
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above pleading was served upon counsel for the defendant in accordance with the provisions of Rule 49 of the Federal Rules of Criminal Procedure on the 18th day of May 2016.

CHRISTOPHER R. WOLFE
Assistant United States Attorney

CONCURRENCE BY DEFENDANT

I, Robin Ashley Meador, have been informed of my right to be indicted within 30 days of the filing of the Criminal Complaint and after consultation with my attorney, knowingly and voluntarily waive my right to be indicted within 30 days of the filing of the Criminal Complaint, join in this motion, and request that the Court grant the extension of time to indict pursuant to 18 U.S.C. § 3161.

ROBIN ASHLEY MEADOR
Defendant

MARK DANIELSON
Attorney for Defendant